

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MAXWELL ROUX, JOHN DUFF III, HENRY
SMITH, and BRUNO NISPEL,

Plaintiffs,

v.

KRISHNA OKHANDIAR (a/k/a Rohit
Okhandiar, Charlotte Fang, Charlie Fang,
Wonyoung Jang, Miya, Xinma33, MissJo, and
Sonya); REMILIA CORPORATION LLC, a
Delaware limited liability company; REMILIA
INDUSTRIES LLC, a Delaware limited liability
company,

Defendants.

Case No. 23-1056-GBW

**STIPULATION AND [PROPOSED] ORDER RE FILING AND
EXTENSION OF TIME TO RESPOND TO FIRST AMENDED COMPLAINT**

Plaintiffs Maxwell Roux, John Duff III, Henry Smith, and Bruno Nispel (“Plaintiffs”) and Defendants Krishna Okhandiar, Remilia Corporation LLC, and Remilia Industries LLC (“Defendants,” and collectively with Plaintiffs, the “Parties”), by and through their respective counsel, hereby stipulate and agree, subject to Order of the Court, as follows:

WHEREAS, Plaintiffs intend to file an shall file a First Amended Complaint pursuant to Fed. R. Civ. P. 15(a)(1).

WHEREAS, Defendants have agreed to accept service of the Summons and First Amended Complaint and will not object to the sufficiency of service of process.

WHEREAS, in exchange for Defendants’ acceptance of service of the Summons and First Amended Complaint, and further based on their voluntary dismissal without prejudice of the

transferred action from the United States District Court for the District of Nevada, *Okhandiar, et al. v. Smith, et al.*, Case No. 1:24-cv-00193 pursuant to Fed. R. Civ. P. 41(a)(1)(A), Defendants have requested an extension through and including April 12, 2024, to answer, move, or otherwise respond to the First Amended Complaint.

NOW, THEREFORE, the Parties stipulate and jointly request that the Court order:

1. Plaintiffs shall file and serve the First Amended Complaint through the CM/ECF system upon undersigned counsel for the Defendants no later than March 8, 2024;
2. Defendants shall be deemed to have been served with the Summons and First Amended Complaint on the date filed and served; and
3. Defendants shall answer, move, or otherwise respond to the First Amended Complaint no later than April 12, 2024.

Dated: March 1, 2024

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LLC; and REMILIA INDUSTRIES LLC

ORDER GRANTING STIPULATION

IT IS SO ORDERED.

Dated: _____

Honorable Gregory B. Williams
UNITED STATES DISTRICT JUDGE